

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,            )  
  )  
          Plaintiff,                                )  
  )  
v.    )  
  )  
TIMOTHY JASON KRIPNER,                )  
  )  
          Defendant.                             )  
  )  
  )  
  )

Case No.: 06-CR-538-JH-LAM

**UNOPPOSED MOTION TO MODIFY THE TERMS OF PRETRIAL RELEASE**

COMES NOW, Timothy Kripner, respectfully moves this Court to modify the terms of his pretrial release to remove the condition of electronic monitoring, in support of same shows as follows:

1. Timothy Kripner has been in Pretrial Release for several months and has been in full compliance during this entire period.
2. One of the conditions of pretrial release is electronic monitoring, a condition with which Mr. Kripner has been in full compliance.
3. United States Pretrial Services Officer Jose Valencia in Tucson, Arizona has indicated non opposition to the removal of the electronic monitoring as a condition of Mr. Kripner’s release.

WHEREFORE, PREMISES CONSIDERED, Defendant Timothy Kripner requests that electronic monitoring be removed as a condition of his Pretrial Release.

Respectfully Submitted,

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By: **/S/ Electronically Filed**  
LEON SCHYDLOWER  
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Attorney for Timothy Kripner

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this instrument was served via electronically CM/ECF and via facsimile to Assistant U.S. Attorney, Luis Martinez, 505-522-2391, on this 4th day of February, 2008.

**/S/ Electronically filed**  
LEON SCHYDLOWER